

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

IN RE:

JAMES A. NEVINS

Case Number: 15-10956-BFK

Debtor

Chapter 13

Bank of America, N.A.

Movant

v.

James A. Nevins,

Respondant

DEBTOR'S RESPONSE TO MOVANT'S MOTION FOR RELIEF FROM STAY

COMES NOW, the Debtor, James A. Nevins, by and through undersigned counsel, Tommy Andrews, Jr., P.C. and Tommy Andrews, Jr. and in response to Movant's said Motion for Relief from Stay states as follows:

1. Debtor generally admits the allegations contained in paragraph 1.
2. Debtor generally admits the allegations contained in paragraph 2.
3. Debtor generally admits the allegations contained in paragraph 3.
4. Debtor generally admits the allegations contained in paragraph 4.
5. Debtor neither admits nor denies the allegations contained in paragraph 5.
6. Debtor neither admits nor denies the allegations contained in paragraph 6.
7. Debtor neither admits nor denies the allegations contained in paragraph 7.
8. Debtor neither admits nor denies the allegations contained in paragraph 8.
9. Debtor generally admits the allegations contained in paragraph 9.
10. Debtor generally denies the allegations contained in paragraph 10 and demands strict proof thereof.
11. Debtor generally denies the allegations contained in paragraph 11 and demands strict proof thereof.
12. Debtor generally denies the allegations contained in paragraph 12 and demands strict proof thereof.
13. Debtor generally denies the allegations contained in paragraph 13 and demands strict proof thereof.

14. Debtor generally denies the allegations contained in paragraph 14 and demands strict proof thereof.

Wherefore, the Debtor prays that the Movant's Motion for Relief from Stay imposed by 11 U.S.C. §362 be denied and for such other and further relief as this Honorable Court deems just and proper under the law.

Respectfully Submitted,
JAMES A. NEVINS
By Counsel,

/s/ Tommy Andrews, Jr.
Tommy Andrews, Jr. #28544
Tommy Andrews, Jr., P.C.
122 North Alfred Street
Alexandria, Virginia 22314
(703) 838-9004

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of December, 2018, I mailed, first class, postage prepaid or via the electronic court filing system a copy of the foregoing Debtor's Response to Movant's Motion for Relief from Stay to:

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Chapter 13 Trustee
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/s/ Tommy Andrews, Jr.
Tommy Andrews, Jr., Esq.